U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 27, 2017

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

> Re: **United States v. Jason Galanis, et al.,**
>   **S1 16 Cr. 371 (RA)**

Dear Judge Abrams:

The Government writes in very brief response to the defendant John Galanis, Devon Archer, Bevan Cooney and Gary Hirst's letter of October 26, 2017 requesting a trial date in mid-July. The Government objects to such an extreme delay. The Court has already agreed – over the Government's objection – to adjourn the trial by three months. Having been given exactly what they initially requested, Galanis, Archer, Cooney and Hirst now request that the adjournment be extended by an additional ten weeks to a date approximately nine months from now. Such a lengthy adjournment is wholly unwarranted. This case has been pending since March 2016 and the defendants have been in possession of the vast majority of discovery for more than a year. By the time of an April trial, the case will have been pending for more than two years. Defense counsel's claim that an April trial date allows them insufficient time to prepare for trial is hard to understand given the length of time this case has been pending and the fact that the April trial date is still more than six months away. Indeed, counsel for Ms. Morton, who did not resume representation of Ms. Morton, until this year, has represented that he will not only be ready for an April trial date but has explicitly requested that trial be set down for that time.

Respectfully submitted,

JOON H. KIM
Acting United States Attorney

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cc: All defense counsel (by ECF)